

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CYTIVA SWEDEN AB, and GLOBAL	)	
LIFE SCIENCES SOLUTIONS USA	)	
LLC,	)	
	)	C.A. No. 18-1899-CFC-SRF
Plaintiffs,	)	Consolidated
	)	
v.	)	<b>DEMAND FOR JURY TRIAL</b>
	)	
BIO-RAD LABORATORIES, INC.,	)	
	)	
Defendant.	)	

**DEFENDANT BIO-RAD LABORATORIES, INC.’S MOTION FOR  
SUMMARY JUDGMENT OF NON-INFRINGEMENT OF THE ’590  
PATENT FOR LACK OF PROOF OF DIRECT INFRINGEMENT**

Defendant Bio-Rad Laboratories, Inc. respectfully moves the Court for summary judgment that asserted claims 1, 2, 3, 4, 10, and 12 of U.S. Patent No. 9,709,590 are not infringed because Plaintiff has failed to identify any instance of direct infringement. The grounds for this Motion are set forth in the opening brief, filed herewith. A proposed order is attached.

OF COUNSEL:

Kevin P.B. Johnson  
Brian C. Cannon  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Tel: (650) 801-5000

David Bilsker  
Felipe Corredor  
Andrew E. Naravage  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Tel: (415) 875-6600

Anne S. Toker  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Tel: (212) 849-7000

Sean D. Damon  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
1300 I Street NW Suite 900  
Washington, D.C. 20005  
Tel: (202) 538-8000

Dated: December 15, 2020  
6968801 / 45671

Respectfully submitted,  
POTTER ANDERSON & CORROON LLP

By: /s/ Alan R. Silverstein  
David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Alan R. Silverstein (#5066)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)  
[asilverstein@potteranderson.com](mailto:asilverstein@potteranderson.com)

*Attorneys for Defendant Bio-Rad  
Laboratories, Inc.*